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May 19, 2021

VIA ECF

Hon. Rachel P. Kovner
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

RE: Vasicka, et al. v. Kerwin, et al.
1:18-CV-06858 (RPK/SJB)

Dear Judge Kovner:

This firm represents the defendant Lynn Kerwin in the above matter.

We have received this Court's Text Order of yesterday setting a June 18, 2021 deadline for defendants to bring a motion for summary judgment.

Unfortunately, I am currently preparing for a jury trial which is scheduled to begin in New York State Supreme Court, Warren County, on June 14, 2021; and which will require the dedication of much of my time over the next several weeks. I am therefore respectfully requesting a one-month extension of the motion filing deadlines as follows:

- Defendants to serve their motions for summary judgment on or before July 19, 2021;
- Plaintiff to serve her response(s) on or before August 20, 2021; and
- Replies, if any, to be served on or before September 9, 2021.

I have discussed the circumstances precipitating this request with counsel for plaintiffs, Gabriel Harvis, Esq., and counsel for defendant LaValley, Jim Tuttle, Esq., and they have consented to this request.

We thank you for your consideration.

Respectfully yours,

GLEASON, DUNN, WALSH & O'SHEA



Lisa F. Joslin

LFJ/ks

cc: Gabriel Harvis, Esq.
James Tuttle, Esq.

Via ECF